

THE HONORABLE JOHN C. COUGHENOUR

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

GRACE CAMPBELL,

Plaintiff,

v.

CATHOLIC COMMUNITY SERVICES OF  
WESTERN WASHINGTON,

Defendant.

NO. C10-1579 JCC

DECLARATION OF ANDREA H. MCNEELY IN  
SUPPORT OF PLAINTIFF'S MOTION FOR  
AWARD OF FEES, LITIGATION EXPENSES,  
AND AN AMOUNT TO OFF SET ADVERSE  
TAX CONSEQUENCES

DATE NOTED: JUNE 1, 2012

I, Andrea H. McNeely, declare the following under penalty of perjury under the laws  
of the United States of America:

1. I am one of the attorneys representing the Plaintiff herein, and I make the  
following statements of my personal knowledge.

2. I am a partner at Gordon Thomas Honeywell LLP with experience in  
representing a number of individuals at trial in employment cases, as well as experience  
preparing and presenting other types of cases at trial. Throughout my career I have  
devoted a significant portion of my practice to employment litigation, and over that time I  
have prepared materials and presented at a number of CLEs on employment law topics.

In 2005 James Beck accepted representation of an individual in a military discrimination

1 case that proceeded to trial in federal court in Seattle in 2007. After Mr. Beck's  
2 successful verdict in that case, Mr. Beck and I have worked together on a number of  
3 cases representing individuals who have been subject to military discrimination in their  
4 employment.

5 3. Mr. Beck and I have spent a significant amount of time and effort in  
6 preparing this case for trial from the time of accepting representation of Grace Campbell.  
7 In addition to plaintiff's contingency work, a substantial portion of my practice involves  
8 work on business litigation that is compensated through hourly fee arrangements. In  
9 preparing this case for trial, it was necessary for me to devote time and energy on Ms.  
10 Campbell's case that would otherwise have been spent on hourly matters. For example,  
11 there were two significant breach of contract matters that I was not able to work on  
12 because of the time and energy devoted to Ms. Campbell's case.  
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14 Dated this 17<sup>th</sup> day of May, 2012, at Tacoma, Washington.

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16 GORDON THOMAS HONEYWELL LLP

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18   
19 Andrea H. McNeely, WSBA No. 36156

CERTIFICATE OF SERVICE

I hereby certify that I served the attached DECLARATION OF ANDREA H. McNEELY IN SUPPORT OF PLAINTIFF'S MOTION FOR AWARD OF FEES, LITIGATION EXPENSES, AND AN AMOUNT TO OFF SET ADVERSE TAX CONSEQUENCES by causing the same to be served by CM/ECF e-service on counsel for defendant at [tmerrick@mhlseattle.com](mailto:tmerrick@mhlseattle.com) and [tnelson@mhlseattle.com](mailto:tnelson@mhlseattle.com).

Dated this 17<sup>TH</sup> day of May, 2012

By: /s/ Jennifer Milsten-Holder  
Jennifer Milsten-Holder  
Gordon Thomas Honeywell LLP